

REMARKS/ARGUMENTS

Reexamination of the captioned application is respectfully requested.

A. SUMMARY OF THIS AMENDMENT

By the current amendment, Applicants basically:

1. Editorially amend the specification.
2. Respectfully traverse all prior art rejections.

B. PATENTABILITY OF THE CLAIMS

Claims 1-4, 6-9 and 11 stand rejected under 35 USC 102(b) as being anticipated by USB Specification Revision 1.1. All prior art rejections are respectfully traversed for at least the following reasons.

Applicants are perplexed that the office action essentially copies Applicants' claim phraseology and only inserts cryptic parenthetical phrases as supposed bases of rejection. Unfortunately, nowhere does the office action cite any page, section, or diagram of the 327 page USB Specification Revision 1.1.

The cryptic parentheticals inserted by the office action into Applicants' claim language are inexplicable and offer no insight into any supposed basis for rejection. For the most part, these parentheticals appear to be concatenations of separate terms of USB Specification Revision 1.1, the concatenations nowhere being found in USB Specification Revision 1.1.

For example, it would appear that the office action alleges that the action of independent claim 1 "transmitting identification information from the apparatus to be controlled to the controlling apparatus" is met by an alleged teaching of "host to hub endpoint identification and enumeration". But Applicants do not find any instance of the

phrase "host to hub endpoint identification and enumeration", or even the phrase "endpoint identification", in USB Specification Revision 1.1. While the terms "host to hub", "endpoint", "identification", and "enumeration" are found separately, there is no clue or insight as to how or why these individual terms could be strung to together to constitute an anticipation of independent claim 1.

As another example, Applicants are at a loss to fathom how claim 3's limitation of "the operation of extracting identification information corresponding to the detected change, from the storage unit" is anticipated by "device configuration and enumeration". Applicants' bewilderment is similarly complicated by the fact that the office action language "device configuration and enumeration" does not reside in USB Specification Revision 1.1. In addition, the office action does not specifically state which structure in USB Specification Revision 1.1 supposedly corresponds to the "storage unit" of claim 3.

The foregoing are but brief, selected examples.

Therefore, unless the current prior art rejections be totally withdrawn, **Applicants respectfully request that a further non-final office action be rendered** which, unlike the November 2, 2006 office action, is **in compliance with the requirements of 37 CFR §1.104**, and particularly the second sentence of subsection (c)(2) thereof (reproduced below):

(2) In rejecting claims for want of novelty or for obviousness, the examiner must cite the best references at his or her command. When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable. The pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified.

Applicants must therefore traverse the present rejections as failing to articulate any clear or cogent basis for denying patentability of Applicants' claims. Applicants can only attempt to conjecture what the Examiner may have in mind.

It appears that perhaps the Examiner is alleging the USB hub to be the claimed "apparatus to be controlled". But, contrary to Applicants' independent claim 1, the USB hub of USB Specification Revision 1.1:

- (i) transmits the connection status that indicates whether or not each USB device is connected to the corresponding downstream port of the USB hub; and
- (ii) does not change the descriptor for the USE host identifying the USB hub itself even when the change of the connection status takes place. Accordingly, cited reference does not disclose the control method for controlling an apparatus to be controlled on the basis of identification information for identifying the apparatus to be controlled as described in present claim 1.

Likewise, contrary to independent claim 2, the USB hub of USB Specification Revision 1.1:

- (i) detects the change of the connection status that indicates whether or not each USE device is connected to the corresponding downstream port of the USB hub; and
- (ii) does not change the descriptor for the USB host identifying the USB hub itself, no matter what the detected change is.

Thus, USB Specification Revision 1.1 does not have structure which fulfills the requirements of the "apparatus to be controlled" of Applicants' independent claim 2, 4, 7, 8, or 9, for example.

C. MISCELLANEOUS

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. A formal indication of allowability is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: _____/H. Warren Burnam, Jr./

H. Warren Burnam, Jr.
Reg. No. 29,366

HWB:lsb
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100